ZEBRA

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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation,** Notice of Inquiry on Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz.
GN Docket No. 17-183

Dear Ms. Dortch:

On May 10, the following representatives from Zebra Technologies Corporation and its affiliate, Zebra Technologies International, LLC, (together "Zebra") met with staff from the FCC's Wireless Telecommunications Bureau ("WTB"), and Office of Engineering and Technology ("OET") to discuss the above-referenced proceeding. Representatives from Zebra included Carl Mower, Edward Richley, Kevin Richardson (Heartland Solutions Group, consultant to Zebra), and Veronica O'Connell (TwinLogic Strategies, consultant to Zebra). Representatives from OET included Jamison Prime, Nicholas Oros, Brian Butler, Bahman Badipour, Barbara Pavaon and Karen Rackley. Representatives from WTB included Ariel Diamond, Blaise Scinto, Thomas Derenge, Stephen Buenszow, Chris Andes, Brain Wondrack.

Zebra reiterated a number of points raised by its comments and reply comments in this docket. In particular, Zebra's Dart RTLS transmitters are certified under FCC Part 15.250, which was created in 2005 by FCC Second Report & Order (See ET Docket 98-153). This Order was the culmination of several years of proceedings, beginning with the NOI of September 1, 1998, and ending with the Third MO&O of August 11, 2010, in which the established limits were upheld. Part 15.250 pertains to the same 5.925-7.125 GHz spectrum which is currently the subject of the NOI of GN Docket 17-183.

Zebra representatives stressed that repurposing ranges from 5.915-7.125 GHz spectrum would render the Zebra Dart system unusable, since the other contemplated users operate at power levels orders-of-magnitude stronger than UWB solutions, thereby severely impacting a substantial number of current and prospective users engaged in nearly every vertical segment of the United States economy.

Respectfully submitted,

Carl Mower, Head of Engineering,
Location Solutions, Zebra Technologies